

IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF TEXAS
TYLER DIVISION

INNOVATIVE GLOBAL SYSTEMS LLC,

Plaintiff,

V.

VOLVO CONSTRUCTION EQUIPMENT
NORTH AMERICA, INC., et al.,

Defendants.

CIVIL ACTION NO. 6:10-cv-00327

JURY TRIAL DEMANDED

**UNOPPOSED MOTION FOR EXTENSION OF TIME TO SUBMIT
DOCKET CONTROL ORDER AND DISCOVERY ORDER**

Pursuant to this Court's Order of November 4, 2010 (Dkt. 135), the current deadline for the parties to submit their proposed Docket Control Order and proposed Discovery Order is November 18, 2010.

As the parties are involved in ongoing meet and confer discussions in an effort to agree to a joint submission, the Plaintiff hereby file this Unopposed Motion for Extension of Time to Submit Proposed Docket Control Order and Discovery Order and respectfully request that the Court extend the deadline up and including November 29, 2010.

This extension is not sought for delay. Rather, such an extension will allow Plaintiff and Defendants sufficient time to further negotiate. All Defendants are unopposed to this Motion.

Dated: November 17, 2010

Respectfully submitted,

/s/ Todd I. Blumenfeld
Michael T. Cooke
State Bar No. 04759650
Jonathan T. Suder
State Bar No. 19463350
Todd I. Blumenfeld
State Bar No. 24067518
FRIEDMAN, SUDER & COOKE
Tindall Square Warehouse No. 1
604 East 4th Street, Suite 200
Fort Worth, Texas 76102
(817) 334-0400
Fax (817) 334-0401
jts@fsclaw.com
mtc@fsclaw.com
blumenfeld@fsclaw.com

Keith A. Rutherford
R. Scott Reese
Sarah R. Cabello
WONG, CABELLO, LUTSCH,
RUTHERFORD & BRUCCULERI, LLP
20333 SH 249, Suite 600
Houston, TX 77070
(832) 446-2400
Fax (832) 446-2424
krutherford@counselip.com
sreese@counselip.com
scabello@counselip.com

Eric M. Albritton
Adam A. Biggs
ERIC M. ALBRITTON, P.C.
P.O. Box 2649
111 West Tyler Street
Longview, TX 75601
(903) 757-8449 x204
Fax (903) 758-7397
ema@emafirm.com
aab@emafirm.com

Thomas John Ward, Jr.
Jack Wesley Hill
WARD & SMITH LAW FIRM
P.O. Box 1231
Longview, TX 75606-1231
Ph.: (903) 757-6400
Fax: (903) 757-2323
jw@jwfir.com
wh@jwfir.com

**ATTORNEYS FOR PLAINTIFF
INNOVATIVE GLOBAL SYSTEMS, LLC**

CERTIFICATE OF SERVICE

I hereby certify that on the 17th day of November, 2010, I electronically filed the foregoing document with the clerk of the court for the U.S. District Court, Eastern District of Texas, Tyler Division, using the electronic case filing system of the court. The electronic case filing system sent a "Notice of Electronic Filing" to the attorneys of record who have consented in writing to accept this Notice as service of this document by electronic means.

/s/ Todd I. Blumenfeld

CERTIFICATE OF CONFERENCE

I hereby certify that on the 16th day of November, 2010, I conferred with Gary Fischman, counsel for Caterpillar, who confirmed that all defendants do not oppose the relief requested.

/s/ Todd I. Blumenfeld